

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)|
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT ON WILDFIRE FUND
MOTION**

[Re: Dkt No. 3444]

Date: August 28, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: August 21, 2019
4:00 p.m. (Pacific Time)

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
3 “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of
5 the Bankruptcy Local Rules for the United States District Court for the Northern District of California,
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the *Motion of Debtors Pursuant to*
9 *11 U.S.C. §§ 105(a) and 363 for an Order Authorizing Debtors to Participate in AB-1054 Wildfire Fund*
10 [Dkt No. 3444] (the “**Motion**”).

11 **RELIEF REQUESTED IN THE MOTION**

12 The Motion seeks an order authorizing the Debtors to participate in and contribute to
13 the Go-Forward Wildfire Fund (as defined in the Motion) upon their emergence from these Chapter 11
14 Cases, in accordance with the terms of the Wildfire Legislation (as defined in the Motion). A proposed
15 order (the “**Proposed Order**”) was attached as an exhibit to the Motion.

16 **NOTICE AND SERVICE**

17 A *Notice of Hearing on Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363 for*
18 *an Order Authorizing Debtors to Participate in AB-1054 Wildfire Fund (the “Wildfire Fund Motion”)*
19 *was filed concurrently with the Motion on August 7, 2019 [Dkt. No. 3447] (the “Notice of Hearing”).*
20 The Motion and the Notice of Hearing were served as described in the Certificate of Service of Alain B.
21 Francoeur filed on August 12, 2019 [Dkt. No. 3508].

22 The deadline to file responses or oppositions to the Motion has passed, and no oppositions
23 have been filed with the Court or received by counsel for the Debtors. The Official Committee of
24 Unsecured Creditors filed the *Statement of the Official Committee of Unsecured Creditors in Support of*
25 *the Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363 for an Order Authorizing Debtors to*
26 *Participate in AB-1054 Wildfire Fund* on August 21, 2019 [Dkt. No. 3636] (the “**UCC Supporting**
27 **Statement**”) expressing its support of the Motion. The Official Committee of Tort Claimants filed the
28 *Response of the Official Committee of Tort Claimants to Motion of Debtors Pursuant to 11 U.S.C.*

1 §§ 105(a) and 363 for an Order Authorizing Debtors to Participate in AB-1054 Wildfire Fund (the
2 “Wildfire Fund Motion”) on August 22, 2019 [Dkt. No. 3664] (the “TCC Response”) which does not
3 object to the specific relief requested in the Motion and seeks to reserve certain rights as described in the
4 TCC Response. The TCC has consented to entry of an order granting the Motion by default.

5 **DECLARATION OF NO OPPOSITION RECEIVED**

6 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
7 that:

8 1. I am a partner with the firm of Keller & Benvenutti LLP, co-counsel for the
9 Debtors.

10 2. I have reviewed the Court’s docket in the Chapter 11 Cases and have determined
11 that no response or opposition other than the UCC Supporting Statement and the TCC Response has
12 been filed with respect to the Motion.

13 3. This declaration was executed in San Francisco, California.

14 WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in
15 the form attached to the Motion, granting the Motion as set forth therein.

16
17 Dated: August 25, 2019

18 **WEIL, GOTSHAL & MANGES LLP**
19 **KELLER & BENVENUTTI LLP**

20 /s/ Jane Kim

Jane Kim

21 *Attorneys for Debtors and Debtors in Possession*
22
23
24
25
26
27
28